

MEMORANDUM

TO: Air Quality Board

THROUGH: Bryce C. Bird, Executive Secretary

FROM: Jay Baker, Environmental Scientist

DATE: March 6, 2019

SUBJECT: PROPOSE FOR PUBLIC COMMENT: Amend R307-150-3. Applicability

Sulfur Dioxide Milestone Inventory Requirements

Utah's Regional Haze State Implementation Plan (SIP) contains sulfur dioxide (SO₂) milestones that are based on 2006 SO₂ emissions from power plants. To ensure that SO₂ emissions reductions are occurring, R307-150 requires power plants to report their annual SO₂ emissions. In 2015, the Board approved a SIP revision with an alternative to Basic Available Retrofit Technology (BART) for NO_x. Part of the alternative included the closure of the Carbon Power Plant. Emission reductions of SO₂ from the closure were included in the demonstration that the alternative was better than BART. Because the SO₂ reductions are part of the BART alternative for NO_x, they should not be counted towards reductions in the SO₂ milestone program. Staff is proposing this amendment to R307-150 to require the Carbon power plant SO₂ emissions to be reported as 8,005 tons/year in the annual SO₂ Milestone Report to EPA.

Recommendation: Staff recommends that the Board propose amended R307-150-3 for public comment.